



# University of Hawaii at Manoa

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SR 145  
EXPRESSING CONCERN ABOUT OSHA AND EPA  
AND REQUESTING ACTIONS TO ALLEVIATE HARDSHIPS TO FARMERS

Statement for  
Senate Committee on  
Agriculture  
Public Hearing - 8 April 1980

By  
Doak C. Cox, Environmental Center

SR 145 expresses concern about the Federal Occupational Safety and Health Act (OSHA) and the Federal Environmental Protection Agency (EPA) and requests actions that may appropriately alleviate hardships to farmers arising from them. This statement, which deals solely with the EPA portion of the resolution, does not reflect an institutional position of the University of Hawaii.

A first minor comment has to do with form. For parallelism it would be preferable either to indicate that the concern is with NEPA, the Federal Environmental Policy Act, rather than with EPA the administering agency, or to indicate that the concern is with both the acts and their administration in the case of both OSHA and NEPA.

Our second comment is more significant. According to the resolution, the Hawaii Farm Bureau Federation has adopted a resolution calling for the repeal of EPA [NEPA]. In detail the NEPA and its administration by EPA may have had undue detrimental effects on farming in Hawaii. We have, indeed, been involved in attempting to have EPA avoid such undue detrimental effects. However, we do not consider that either abolition of EPA or repeal of NEPA is warranted. We suggest that the Legislature should emphasize the need for such revisions of NEPA and changes in its administration by EPA that will take Hawaii's environmental conditions into account and avoid undue detriment to Hawaii's farm operations, rather than repeal of NEPA.